BellSouth Telecommunications, Inc.

Suite 2101

333 Commerce Street

Nashville, Tennessee 37201-3300

615 214-6301 Fax 615 214-7406 Guy M. Hicks General Counsel

December 15, 1999

VIA HAND DELIVERY

David Waddell, Executive Secretary Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37238

Re:

Petition by ICG TELECOM GROUP, INC. for Arbitration of an Interconnection Agreement with BELLSOUTH TELECOMMUNICATIONS, INC. pursuant to Section 252(b) of the Telecommunications Act of 1996

Docket No. 99-00377

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth Telecommunications, Inc.'s Late-Filed Exhibit 3. Copies of the enclosed are being provided to counsel of record for ICG.

ery truly yours,

Guy M. Hicks

GMH:ch Enclosure



Tennessee Regulatory Authority
Docket 99-00377
Late Filed Exhibit 3

Comparison of ICG's proposed measurements to Service Quality Measurements currently published by BellSouth

Incorporates BellSouth Comments on Late Filed Exhibit 2 regarding unnecessary measurements

	Similar measurements	FOC Average Interval (Days)	Another way to measure FOC timeliness.	6. Average 1 ime to Return FOC
Not necessary. Another way to measure FOC timeliness as Measurement #6 below does.	Similar measurements	Firm Order Confirmation Timeliness	A measure of FOC timeliness.	Confirmations Returned within specified time.
	Similar measurements. BST measures 12 systems.	OSS Interface Availability	Measures only 2 systems.	4. OSS Interface Availability
		Time		
		TAG Average Response Time		
	Similar measurements	LENS Average Response Time		3. EASE Average Response Time
	Similar measurements	Percent Response received within "X" Seconds		2. Percent Kesponse received within "X" Seconds – OSS Interfaces
	Similar measurements	Average OSS Response Interval (Pre-Ordering)		1. Average Response Time for OSS Pre-Order Interfaces
				RESALE SPECIALS AND UNES A. Pre-Ordering/Ordering
BellSouth Comments	Comments on comparison of ICG and BST measurements	BST Existing Service Quality Measurements. A blank cell indicates no comparable measurement to ICG proposal.	Comments on ICG Proposal	ICG Proposal A blank cell indicates no comparable measurement to BST existing SQM

	Similar measurements The BST measurement offers 8 levels of product disaggregation including comparisons to BST retail.	% Rejected Service Requests - Mechanized.	disaggregation provided.	9. % Rejects
	Similar measurements The BST measurement offers 8 levels of product disaggregation including comparisons to BST retail.	Average Completion Notice Interval (Hours)	This is a provisioning measurement. It is also duplicative of the above two measurements except it measures an average vs. at two time points.	8. Average Time to Return Mechanized Completions
Not necessary. Another way to measure Order Completion Notice timeliness as measurement #8 does.	Similar measurements. The BST measurement offers 8 levels of product disaggregation including comparisons to BST retail.	Average Completion Notice Interval (Hours)	This is a provisioning measurement. It is also duplicative of the above measurement, with the exception of 1 day time frame vs. 1 hour. There is no disaggregation provided	7.1. % Mech. Completions Avail within 1 day of work completion
Not necessary. Another way to measure Order Completion Notice timeliness as measurement #8 does. Additionally, SORD is a SBC system for which there may not be an equivalent in BellSouth.	Similar measurements. The BST measurement offers 8 levels of product disaggregation including comparisons to BST retail.	Average Completion Notice Interval (Hours)	This is a provisioning measurement. There is no disaggregation provided.	7. % Mechanized Completions Avail within 1 hour of completion in SORD.
BellSouth Comments	Comments on comparison of ICG and BST measurements	BST Existing Service Quality Measurements. A blank cell indicates no comparable measurement to ICG proposal.	Comments on ICG Proposal	ICG Proposal A blank cell indicates no comparable measurement to BST existing SQM

Tennessee Regulatory Authority Docket 99-00377 Late Filed Exhibit 3 Incorporates BellSouth Comments on Late Filed Exhibit 2 regarding unnecessary measurements

Not necessary. Provisioning errors would result in either Installation Trouble Reports (Meas. #35, 46, 59, 89, 98) or billing adjustments as reflected in the measures below. In the NPRM, the FCC concluded ordering/provisioning errors should be measured by Installation Trouble Reports, (Docket CC 98, 56, Bar. 68)				12. Mechanized Provisioning Accuracy
	Similar measurements	Reject Distribution Interval- Non Mechanized		11.1. Mean Time to Return Manual Rejects that are Received Electronically via LEX or EDI.
	Similar measurements	Reject Distribution Interval- Mechanized	Similar to measure #10. Another way to measure reject timeliness.	11. Mean Time to Return Mechanized Rejects
Not necessary. Another way to measure Reject Timeliness measurement #11 does.	Similar measurements	Reject Distribution Interval- Mechanized		10. % Mech. Rejects within 1 Hour of receipt of reject in EDI/LASR
	Non-Mechanized. The BST measurement offers 8 levels of product disaggregation including comparisons to BST retail.	% Rejected Service Requests - Non-Mechanized.		
BellSouth Comments	Comments on comparison of ICG and BST measurements	BST Existing Service Quality Measurements. A blank cell indicates no comparable measurement to ICG proposal.	Comments on ICG Proposal	ICG Proposal A blank cell indicates no comparable measurement to BST existing SQM

ICC Pronosal A blank		DOT Frieding Comits		
ico i i oposai a ouna		DOI EXISTING SERVICE	Comments on	BellSouth Comments
cell indicates no comparable	!	Quality	comparison of ICG	
medsurement to BS1 existing	Comments on ICG	Measurements. A blank	and BST	
00/12	Proposal	cell indicates no comparable	measurements	
		measurement to ICG		
		proposal.		
13. Order Process % Flow-		% Flow-Through Service	Similar measurements	
I hrough		Requests		
		% Flow Through Service		
		Requests Detail		
		% Flow Through Error		
		Analysis		
B. Billing				

ICG Proposal A blank cell indicates no comparable measurement to BST existing SQM	Comments on ICG Proposal	BST Existing Service Quality Measurements. A blank cell indicates no comparable measurement to ICG proposal.	Comments on comparison of ICG and BST measurements	BellSouth Comments
14.Billing Accuracy		Invoice Accuracy	Similar measurements.	Not necessary. BST has a
		Bill Auditing processes.		measure of Invoice Accuracy
				(SQM page 46) and BST
				each month. BellSouth's
				Invoice Accuracy
				measurement reflects the
				accuracy of the data within
				billing invoices that are
				actually delivered to the
				CLEC or to the BST end-
				user. If a billing error is
				rejected within the current
				Bill Verification process
				(mechanism designed to
				correct errors before they are
				released) prior to delivery to
				the CLEC or to a BST end-
				user, the error is transparent
				to the customer. BellSouth
				believes that this measure is
				sufficient to assess the
				accuracy of the invoice
				Large CLEC accounts
				equivalent of several hundred
				to several thousand end-user
				accounts. Billing errors based
				on \$ adjustments of revenue
				is a more accurate measure
				for billing than random
				sampling which would look
•				at only a small peragatage of
				the bills.

Tennessee Regulatory Authority Docket 99-00377 Late Filed Exhibit 3 Incorporates BellSouth Comments on Late Filed Exhibit 2 regarding unnecessary measurements

Not necessary. If there is an issue here, it is self correcting. It is in BST's interest to bill the CLEC for usage.			The second secon	
Not necessary. If there is an issue here, it is self correcting. It is in BST's interest to bill the CLEC for				
Not necessary. If there is an issue here, it is self				
Not necessary. If there is an				
				20.Unbillable Usage
		Timeliness		ишкинкаа
	Similar measurements	Mean Time to Deliver Usage.		19. Daily Usage Feed Timeliness
		Invoices		(Wholesale Bill)
	Similar measurements	Mean Time to Deliver		18. Billing Timeliness
measurement is not clear.				
billing. The value of this				
service order completion not				
measurement is one of				
Not necessary. This				17. Billing Completeness
Accuracy. (ICG #14).				
duplicative of Billing		Accuracy		Transmitted Correctly
Not necessary and	Similar measurements	Usage Data Delivery		16. % of Usage Records
the bills go out.				
errors are corrected before				
processes are stopped and				
out of balance situation,				
are error free. If there is an				
provides bills via EDI that				
Accuracy (ICG #14). BST				Bills
duplicative of Billing				Complete Formatted Mech.
Not necessary and				15. % of Accurate and
		measurement to ICG proposal.		
	measurements	cell indicates no comparable	Proposal	SQM
	and BST	Measurements. A blank	Comments on ICG	measurement to BST existing
ά 	comparison of ICG	Quality		cell indicates no comparable
BellSouth Comments	Comments on	BST Existing Service		ICG Proposal A blank

cell indicates no comparable measurement to BST existing SQM	Comments on ICG	BST Existing Service Quality	Comments on comparison of ICG	BellSouth Comments
cell indicates no comparable measurement to BST existing SQM	Comments on ICG	Quality	comparison of ICG	
NÕS		VICASUFEMENTS. A blank	and RST	
	Proposal	cell indicates no comparable measurement to ICG	measurements	
		proposal.		
C. Miscellaneous				
Administrative				
21. LSC (Local Svc. Ctr.)		Speed of Answer in Ordering	Similar measurements	
Average Speed of Answer		Center (LCSC)		
C Grade of Service	Similar to 21 above. Another	Speed of Answer in Ordering	Similar measurement – in	Not necessary. Another way
(GOS)	way to measure speed of	Center (LCSC)	concept.	to measure Speed of Answer
	ails w C1.			as measurement #21 does.
Service Center			% Busy and Grade of Service	Not necessary. Busy
COLINCI			are of little value to the	conditions are rare. Busy
			of nondiscriminator:	to and the sent, would
			treatment is how long does it	volume, which would be
			take to answer the call	reflected in Speed of Answer
24 (I coal Owns Ct.) I CC				measurement (ICG #21).
Average Speed of Answer		Average Answer Time – UNE Center	Similar measurements	
C Grade of Service	Similar to 21 above. Another	Average Answer Time –	Similar measurements	Not necessary. Another way
(000)	way to illeasure speed of	UNE Center		to measure Speed of Answer
	ATTO W CT			as measurement #24 does.
zo. 76 Busy III ulle LOC			% Busy and Grade of Service	Not necessary. Busy
			are of little value to the	conditions are rare. Busy
			CLEC. The primary measure	conditions, if present, would
			of nondiscriminatory	be a result of heavy calling
			treatment is how long does it	volume, which would be
			take to answer the call	reflected in Speed of Answer
				measurement (ICG #24).

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ICG Proposal A blank cell indicates no comparable measurement to BST existing	Comments on ICG	BST Existing Service Quality	Comments on comparison of ICG	BellSouth Comments
SQM	Proposal	cell indicates no comparable measurement to ICG proposal.	measurements	
		Average Answer Time – Resale Maint Center		
II. RESALE POTS AND				
UNE LOOP AND PORT				
COMBINATIONS				
COMBINED BY ILEC				
A. Provisioning				
27. Mean Installation Interval		Average Order Completion Interval	Similar measurements. BST provides additional	
28 % Installations completed	Similar to #27 Another way	Order Completion Interval	Product disubbrobuton.	VI-4
within "X" Business Days-	to measure installation	Distribution	BST provides additional	to measure Installation
POTS	interval.		product disaggregation.	Interval as Measurement #27
20 0/ CWPT C 1 1 1				does.
29. % SWB1 Caused Missed		% Missed Installation	Similar measurements.	
Due Dates		Appointments less % Missed	BST provides additional	
		Installation Appts Caused by End User.	product disaggregation.	
30. % Company Missed Due		% Missed Installation	Similar measurements.	Not necessary. % Company
Dates due to fack of Facilities		Appointments. Mean Held Order Interval - Held for	product disaggregation	Missed DD due to facilities is included in the % Company
		Facilities		Caused Missed DD (#29).
				This is just a drill down of
				#29. The more critical issue
				is"Did BellSouth miss the
				That is measured by #29.

		Held Order Interval Distribution		
Missed Due Dates (ICG #29).		caused		Cross man 100 (1000)
Not necessary. Another way	Similar measurements	% Missed Installation		Orders with No Access)
	Sillinal illeasulellells	within 30 days	7 - 7 - 7 - 7 - 7 - 7 - 7 - 7 - 7 - 7 -	10 Days (1-10) of Installation
	Cimilar magazzanta	0/ Drovisioning Troubles		35 % Trouble Reports within
is #29 – Company Caused Missed Due Dates.				
user affecting, measurement				
to the ILEC. The key, end-				
caused misses are attributable				
cancellations after ILEC				
misunderstanding. Not all				the DD caused by SWBT
Not necessary and prone to				34. # of Orders canceled after
measures 29 and 32.				
somewhat duplicative of			measures 29 and 32.	Due Dates > 30 Days
Not necessary. This is	Similar measurements	Mean Held Order Interval	Somewhat duplicative of	33. % SWBT Caused Missed
	product disaggregation.			
	BST provides additional			SWBT Missed Due Dates
	Similar measurements.	Mean Held Order Interval		32. Average Delay Days for
#32.				
Days for Missed Due Dates				
reason drill-down of Delay				
SQM, it is simply a reason by	product disaggregation.			Fac.
While it is available in BST's	BST provides additional	Held for Facilities	below.	Missed DD due to lack of
Not a critical measurement.	Similar measurements.	Mean Held Order Interval -	A drill down of measure #32	31. Ave. Delay Days for
		proposal.		
	measurements	cell indicates no comparable	rioposai	K
	and BST	Measurements. A blank	The source	Some successive services
	comparison of ICG	Quality	Comments on ICC	maggirement to RST axisting
BellSouth Comments	Comments on	bo i Existing Service		all in dignates an annual la
2				זרות חשתתתחו ויוווו

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	0-7			
	Resale Res, Resale Bus,		UNE Combo.	
	Similar measurements BST product disaggregation is	Maintenance Average Duration	POTS – Res, POTS Bus and	39. Receipt to Clear Duration
	Similar measurements. BST product disaggregation is Resale Res, Resale Bus, Resale Design, UNE Design, UNE-Non Design.	% Missed Repair Appointments	POTS – Res, POTS Bus and UNE Combo.	Commitments
	disaggregation is Resale Res, Resale Bus, Resale Design, UNE Design, UNE-Non Design.		Combo.	20 0/ Minod Book
	BST measurement provides additional disaggregation of troubles requiring dispatch and non-dispatch; product	Rate	troubles requiring a dispatch vs. non-dispatch. Product disaggregation is POTS – Res, POTS Bus and UNE	
	Similar measurements.	Customer Trouble Report	No separation between	37. Trouble Report Rate
				B. Maintenance
		Average Jeopardy Notification Interval		
		% of Orders in Jeopardy		
		Mean Held Order Interval - Held for Other		
		Mean Held Order Interval - Held for Equipment		
		proposal.		
	measurements	cell indicates no comparable measurement to ICG	Froposal	,
	and BST	Measurements. A blank	Comments on ICG	measurement to BST existing
BellSouth Comments	Comments on	BST Existing Service		cell indicates no comparable
				122

	Similar measurements	Average Order Completion Interval		43. Average Installation Interval
				A. Provisioning
				PORT COMBINATIONS
				III. RESALE SPECIALS
end-user miscommunication.				Access)
measurement of CLEC and				Trouble Reports with No
Not necessary. This is a				42. % No Access (% of
	repeat reports.			
	stringent measurement of			
	day window is a more			
	and non-dispatch. The 30			
	troubles requiring dispatch		disaggregation is POTS	
	additional disaggregation of		vs. non-dispatch. Product	
	measurement provides	Days	troubles requiring a dispatch	days
	Similar measurements. BST	% Repeat Troubles within 30	No separation between	41. % Repeat Reports in 10
	Resale Design, UNE			
	Resale Res, Resale Bus,			
	product disaggregation is		Combo.	
	and non-dispatch. BST		Res, POTS Bus and UNE	
	troubles requiring dispatch		disaggregation is POTS –	
is the inverse.	additional disaggregation of		vs. non-dispatch. Product	
greater than 24 hours. ICG's	measurement provides	Hours	troubles requiring a dispatch	< 24 Hours
BST's measure is OOS	Similar measurements. BST	% Out of Service (OOS) > 24	No separation between	40. % Out of Service (OOS)
		proposal.		
	шсазы сшенез	measurement to ICG	,	
	moscuromente	cell indicates no comparable	Proposal	MÃS
	and BST	Measurements. A blank	Comments on ICG	measurement to BST existing
	comparison of ICG	Quality		cell indicates no comparable
BellSouth Comments	Comments on	BS1 Existing Service		ICG Proposal A blank
)	2		1777

		measurement to ICG		
		proposal.		
44. % Installations completed	Similar to #43. Another way	Order Completion Interval	Similar measurements	Not necessary Another way
within 20 Business Days	to measure installation	Distribution	1	to measure Installation
	interval.			Interval as Measurement #43
				does. 20 day interval appears
				arbitrary.
45. % SWBT Caused Missed		% Missed Installation	Similar measurements	
Due Dates		Appointments less % Missed		
		Installation Appts Caused by		
		End ∪ser.		
46. % I rouble Keports within		% Provisioning Troubles	Similar measurements	
30 Days (1-30) of Installation		within 30 days		
47. % Company Missed Due		% Missed Installation	Similar measurements	Not necessary. % Company
Dates due to lack of Facilities		Appointments. Mean Held		Missed DD due to facilities is
		Order Interval - Held for		included in the % Company
		Facilities		Caused missed DD (#45).
				This is just a drill down of
				#45. The more critical issue
				is"Did BellSouth miss the
				Due Date for ANY reason?"
				That is measured by #45.
48. Delay Days for Missed	A drill down of measure #49	Mean Held Order Interval -	Similar measurements	Not a critical measurement.
DDs due to lack of Facilities	below.	Held for Facilities		While it is available in BST's
				SQM (Mean Held Order
				Interval - Facilities Page 18),
				it is simply a reason by
				reason drill-down of Delay
_				Dave for Microst Disa Datos

	Similar measurements	% Repeat Troubles within 30 Days		53. % Repeat Reports
		Duration		
	Similar measurements	Maintenance Average		52. Mean Time to Restore
				B. Maintenance
		Notification Interval		
		Average Jeopardy		
		% of Orders in Jeopardy		
		Held for Other		
		Mean Held Order Interval -		
		Held for Equipment		
		Mean Held Order Interval -		
		Distribution		
		Held Order Interval		
Missed Due Dates.				
is #29 – Company Caused				
user affecting, measurement				
to the ILEC. The key, end-				
caused misses are attributable				
cancellations after ILEC				
misunderstanding. Not all				use DD caused by SWDI
Not necessary and prone to				the DD caused by SWRT
measures 45 and 49.				51 # of Orders canceled after
somewhat duplicative of			measures 45 and 49.	Duc Daics / mail 50 Days
Not necessary. This is	Similar measurements	Mean Held Order Interval	Somewhat duplicative of	Due Dates > than 20 Days
	Similar measurements	viean Held Order Interval		Missed Due Dates
		proposar.		49 Delay Days for SWRT
	measurements	measurement to ICG	ı	
	allu BOI	cell indicates no comparable	Proposal	NÕS
	and BCT	Measurements A blank	Comments on ICG	measurement to BST existing
BellSouth Comments	Comments on	Onality		cell indicates no comparable
		BCT Fricting Commiss		ICG Proposal A blank

cell indicates no comparable		Quality	comparison of ICG	Densouth Comments
measurement to BSI existing	Comments on ICG	Measurements. A blank	and BST	
MAG	Proposal	cell indicates no comparable	measurements	
		proposal.		
54. Failure Frequency		Customer Trouble Report Rate	Similar measurements	
		% Missed Repair		
		Appointments		
		% Out of Service (OOS) > 24		
IV. UNBUNDLED				
NETWORK ELEMENTS				
(UNES)				
A. Provisioning				
55. Average Installation		Average Order Completion	Similar measurements	
Interval	- Translation -	Interval		
55.1. Average Installation		Average Order Completion	Similar measurements –	
Interval – DSL		Interval	DSL is included with the	
			UNE Design category.	
55.2. Average Installation		Total Service Order Cycle	Similar measurements.	
Interval for Loop with LNP		Time for UNE Design, Non		
		Design and Total Service		
		Order Cycle Time for LNP.		
56. % Installations completed	Similar to #55. Another way	Total Service Order Cycle	Similar measurements The	Not necessary. Another way
within "X" Business Days	to measure installation	Time Distribution for UNE	% completion can be derived	to measure Installation
	interval.	Design, Non Design and	from the Completion Interval	Interval as Measurement #55
		Total Service Order Cycle	Distribution details.	does.
		Time Distribution for LNP.		

modeliromont to RCT oxieting		-		
			1	
measurement to box existing	Comments on ICA	Measurements. A blank	and BST	
SOM	Dronosal			
500	rroposai	cell indicates no comparable	measurements	
		measurement to ICG		
		proposal.		
56.1. % Installations	Similar to #55.2. Another	Total Service Order Cycle	Similar measurements. The	Not necessary. Another way
completed within industry	way to measure installation	Time Distribution for UNE	% completion can be derived	to measure Installation
guidelines for LNP with	interval.	Design, Non Design and	from the Completion Interval	Interval as Measurement
Loop		Total Service Order Cycle	Distribution details.	#55.2 does.
		Time Distribution for LNP.		
57. Average Response Time				Not necessary. Loop makeun
for Loop Make-Up				information is one step of the
Information				ordering process and the time
				for loop makeup is included
00 0/ CWDT 0 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1				in FOC timeliness.
Dine Dates		Amointment log 0/ Minod	Similar measurements.	
\$ 50 E 500 E		Appointments ices /0 iviseed		
		Installation Appts Caused by		
		End ∪ser.		
59. % Trouble Reports within		% Provisioning Troubles	Similar measurements.	
30 Days (1-30) of Installation		within 30 days		
60. % Missed Due Dates due		% Missed Installation	Similar measurements.	Not necessary. % Missed
to lack of Facilities		Appointments. Mean Held		DD due to facilities is
		Order Interval - Held for		included in the % Company
		Facilities		Caused missed DD (#58).
				This is just a drill down of
				#58. The more critical issue
				is"Did BellSouth miss the
				Due Date for ANY reason?"
				That is measured by #58.

		Average Jeopardy Notification Interval		
		% of Orders in Jeopardy		
		Held for Other		
		Moon Hold Ondon Internal		
		Held for Fanishment		
		Man Hald Onder Indiana		
		Heid Order Interval Distribution		
Missed Due Dates.				
is #58 – Company Caused				
user affecting, measurement				
to the ILEC. The key, end-				
caused misses are attributable				
cancellations after ILEC				
misunderstanding. Not all				are by caused by 5 ft b1
Not necessary and prone to			-	the DD caused by SWRT
measures 58 and 62.				64 # of Orders canceled after
somewhat duplicative of	concept.		Hicasules 28 and 02.	Eur Euros, man do Eays
Not necessary. This is	Similar measurements in	Mean Held Order Interval	Somewhat dupitcative of	Due Dates > than 30 Days
		TI II O	Companie dunification of	63 % CW/RT Caused Missed
	Similar measurements.	Mean Held Order Interval		62. Ave. Delay Days for SWBT Missed Due Dates
#62.				
Days for Missed Due Dates				
reason drill-down of Delay				
SQM, it is simply a reason by				T actitities
While it is available in BST's		Held for Facilities	DEIOW.	Facilities
Not a critical measurement.	Similar measurements.	Mean Held Order Interval -	A drill down of measure #62	Missed DDs due to leaf
		proposal.	۸ النام	61 Avia Delay Davia for
		measurement to ICG		
	measurements	cell indicates no comparable	Froposal	K
	and BST	Measurements. A blank	Comments on ICC	WOS
	comparison of ICG	Quality	Comments on ICC	measurement to RST existing
Bensouth Comments	Сощшентя он	Extracting out vice		cell indicates no comparable
ם ווני ביוני	Commonto	BST Existing Service		ICG Proposal A blank

ICG Proposal A blank cell indicates no comparable		BST Existing Service	Comments on	BellSouth Comments
measurement to BST existing SQM	Comments on ICG Proposal	Measurements. A blank cell indicates no comparable measurement to ICG proposal.	and BST measurements	
B. Maintenance		proposat.		
65. Trouble Report Rate		Customer Trouble Report	Similar measurements.	
66. % Missed Repair		% Missed Repair	Similar measurements	
Commitments		Appointments	CHILD III CHICAGO	
67. Mean Time to Restore		Maintenance Average Duration	Similar measurements.	
68. % Out of Service (OOS)		% Out of Service (OOS) > 24	Similar measurements. The	BST's SOM Measurement is
< X Hours		Hours		OOS greater than 24 hours. (SOM Page 41)
69. % Repeat Reports		% Repeat Troubles within 30 Days	Similar measurements.	
V. INTERCONNECTION TRUNKS				
70. % Trunk Blockage		Trunk Group Service Summary which individually	Similar measurements.	
		tabulates local trunk groups and common transport		
70.1 Count of Blocked calls		groups.		
excluded from % of Trunk Blockage				This measurement is not clear and would not appear to be critical
71. Common Transport Trunk Blockage		Trunk Group Service Summary which individually tabulates local trunk groups	Similar measurements.	
		and common transport groups.		

		% of Orders in Jeopardy		
		Distribution		
		Order Completion Interval		
	Similar measurements.	Average Order Completion Interval		Trunk Installation Interval
groups.				78 1
CLEC originating groups. BST does not control these				Groups
It is not clear if this includes				Service Affecting Trunk
down of measurement #76.				Restoration Interval for
Not necessary. This is a drill	TO A STATE OF THE			77. Average Trunk
		Duration		Restoration Interval
	Similar measurements.	Maintenance Average		76. Average Trunk
somewhat duplicative of measures 73 and 74.			measures 73 and 74.	Due Dates > 30 Days
Not necessary. This is	Similar measurements.	Mean Held Order Interval	Somewhat duplicative of	75. % SWBT Caused Missed
				Missed Due Dates
	Similar measurements.	Mean Held Order Interval		74. Average Delay Days for
		End User.		
		Installation Appts Caused by		;
	Change Hickory of Children	Appointments less % Missed		Dates
	Similar measurements	% Missed Installation		73. Percent Missed Due
		Service Detail.		
		groups. Trunk Group		
		and common transport		
		tabulates local trunk groups		Exceeding 2% / 1%
		Summary which individually		Transport Trunk Groups
	Similar measurements.	Trunk Group Service		72. Distribution of Common
		proposal.		
		measurement to ICG		
	measurements	cell indicates no comparable	Proposal	MÕc
	and BST	Measurements. A blank	Comments on ICG	medsurement to BS1 existing
	comparison of ICG	Quality		cell indicates no comparable
BellSouth Comments	Comments on	BS1 Existing Service		ICG Froposal A blank
				100 h

Comparison of ICG's proposed measurements to Service Quality Measurements currently published by BellSouth

Incorporates BellSouth Comments on Late Filed Exhibit 2 regarding unnecessary measurements

Not necessary. This is another way to measure DA Speed of Answer as reported by measurement #80	Similar measurements.	Average Speed of Answer	to measure speed of answer.	Grade of Service
			Similar to #80 Another way.	ASSISTANCE (DA) AND OPERATOR SERVICES (OS) 79 Directory Assistance
		% Out of Service (OOS) > 24 Hours		VI. DIRECTORY
		% Repeat Troubles within 30 Days		
		% Missed Repair Appointments		
		Customer Trouble Report Rate		
		% Provisioning Troubles within 30 days		
		Average Jeopardy Notification Interval		
	measurements	cell indicates no comparable measurement to ICG proposal.	Proposal	o Kin
BellSouth Comments	Comments on comparison of ICG and BST	BST Existing Service Quality Measurements. A blank	Comments on ICG	cell indicates no comparable measurement to BST existing

ICG Proposal A blank		BST Existing Service	Comments on	BellSouth Comments
cell indicates no comparable measurement to BST existing SQM	Comments on ICG Proposal	Quality Measurements. A blank cell indicates no comparable measurement to ICG proposal.	comparison of ICG and BST measurements	
80. Directory Assistance		% Answered within "X"	Similar measurements	Not necessary for detection
Average Speed of Answer		Seconds		of Non-Discriminatory
				Access because all calls from
				CLEC and BellSouth retail
				customers go to the same
				operator pool. However the
				FCC and state commissions
				have ruled that this is a
				required measurement.
of Saminary Services Grade	Similar to #82 Another way	Operator Services (Toll)	Similar measurements.	Not necessary. This is
of Service	to measure speed of answer.	Average Speed of Answer		another way to measure
				Operator Svcs Speed of
				Answer as reported by
				measurement #82.
82. Operator Services		% Answered within "X"	Similar measurements.	Not necessary for detection
Average Speed of Answer		Seconds		of Non-Discriminatory
				Access because all calls from
				CLEC and BellSouth retail
				customers go to the same
				operator pool. However the
				FCC and state commissions
				have ruled that this is a
				required measurement.
83. % Calls Abandoned			Parity by Design – All calls	Not necessary for detection
			go to the same Operator pool	of Non-Discriminatory
				Access because all calls from
				CLEC and BellSouth retail
				customers go to the same
	,			operator pool.

Not necessary. Another way to measure Installation Interval as Measurement #88 does	CLEC ordering of INP is relatively small since metro areas have converted to I NP.	Order Completion Interval Distribution. INP is included with UNE Design or UNE- Non-Design.		within X (3,7,10) Bus. Days
				PORTABILITY (INP)
Not necessary for detection of Non-Discriminatory Access because all calls from CLEC and BellSouth retail customers go to the same operator pool.	Parity by Design – All calls go to the same Operator pool			86. Non-Call Busy Work Volumes
Not necessary for detection of Non-Discriminatory Access because all calls from CLEC and BellSouth retail customers go to the same operator pool. Additionally Average Work Time is an internal efficiency measurement that should not be a concern of CLECs.	Parity by Design – All calls go to the same Operator pool			85. Average Work Time
Not necessary for detection of Non-Discriminatory Access because all calls from CLEC and BellSouth retail customers go to the same operator pool.	Parity by Design – All calls go to the same Operator pool			84. % Calls Deflected
BellSouth Comments	Comments on comparison of ICG and BST measurements	BST Existing Service Quality Measurements. A blank cell indicates no comparable measurement to ICG proposal.	Comments on ICG Proposal	ICG Proposal A blank cell indicates no comparable measurement to BST existing SQM

ICG Proposal A blank		BST Existing Service	Comments on	BellSouth Comments
cell indicates no comparable		Quality	comparison of ICG	
meusurement to bot existing	Comments on ICG	Measurements. A blank	and BST	
O C Z	Proposal	cell indicates no comparable	measurements	
		measurement to ICG		
		proposal.		
88. Average INP Installation		Average Order Completion	Similar measurements.	
Interval		Interval. INP is included	CLEC ordering of INP is	
		with UNE Design or UNE-	relatively little since metro	
		Non-Design.	areas have converted to LNP.	
89. % INP I-Reports within		% Provisioning Troubles	Similar measurements.	
30 Days		within 30 days. INP is	CLEC ordering of INP is	
		included with UNE Design or	relatively little since metro	
		UNE-Non-Design.	areas have converted to LNP.	
90. % Missed Due Dates		% Missed Installation	Similar measurements.	
		Appointments. INP is	CLEC ordering of INP is	
		included with UNE Design or	relatively little since metro	
		UNE-Non-Design.	areas have converted to LNP.	
		Mean Held Order Interval.		
		INP is included with UNE		
		Design or UNE-Non-Design.		
		Held Order Interval		
		Distribution. INP is included		
		with UNE Design or UNE-		
THE TOOLS IN		Non-Design.		
PORTABILITY (LNP)				
91. % LNP Due Dates within		Order Completion Interval	Similar maggiraments The	Vict management of the
Industry Guidelines		Distribution	% completion can be derived	derived from Order
			from the Completion Interval	Completion Interval
			Distribution details	Distribution (SOM Dagger)

Comparison of ICG's proposed measurements to Service Quality Measurements currently published by BellSouth

Incorporates BellSouth Comments on Late Filed Exhibit 2 regarding unnecessary measurements

Proposal Propos	WOS		Measurements. A blank	and BST	
measurement to ICG proposal. Proposal. Similar measurements Timeliness Timeliness Timeliness Timeliness Timeliness Timeliness Timeliness Timeliness Timeliness		Proposal	cell indicates no comparable		
Firm Order Confirmation		•	measurement to ICG proposal	measurements	
Firm Order Confirmation Firm Order Confirmation Firm Order Confirmation Similar measurements Timeliness Timeliness BellSouth will not issue disconnect until activate msg. is received from NPAC.	92. % of time the old Service		L. J. Const.		N
Firm Order Confirmation Firm Order Confirmati	Provider releases				Not necessary. This is a
Firm Order Confirmation Firm Order Confirmation Firm Order Confirmation Firm Order Confirmation Similar measurements Timeliness Timeliness BellSouth will not issue disconnect until activate msg. is received from NPAC.	Subscription				diagnostic measurement of
Firm Order Confirmation Firm Order Confirmation Firm Order Confirmation Similar measurements Timeliness BellSouth will not issue disconnect until activate msg. is received from NPAC.	prior to the expiration of the				the number porting process.
Firm Order Confirmation Firm O	second 9 hour timer				The key end-user affecting
Firm Order Confirmation Firm Order Confirmation Firm Order Confirmation Firm Order Confirmation Similar measurements Timeliness BellSouth will not issue disconnect until activate msg. is received from NPAC.	COCCUR / MORI CHILDI				measurement is %
Firm Order Confirmation Similar measurements Timeliness Firm Order Confirmation Firm Order C					Installation Appointments
Firm Order Confirmation Firm Order Confirmation Firm Order Confirmation Similar measurements Timeliness Timeliness BellSouth will not issue disconnect until activate msg. is received from NPAC.					Met (analogous to %
Firm Order Confirmation Firm Order Confirmation Firm Order Confirmation Similar measurements Timeliness BellSouth will not issue disconnect until activate msg. is received from NPAC.					Company Caused Missed
Firm Order Confirmation Firm Order Confirmation Similar measurements Timeliness BellSouth will not issue disconnect until activate msg. is received from NPAC.	03 % of Customore				Due Dates.)
Firm Order Confirmation Firm Order Confirmation Similar measurements Timeliness BellSouth will not issue disconnect until activate msg. is received from NPAC.	restrictured prior to I NID due				Not necessary. This is a
Firm Order Confirmation Firm Order Confirmation Similar measurements Timeliness BellSouth will not issue disconnect until activate msg. is received from NPAC.	date				diagnostic measurement of
Firm Order Confirmation Firm Order Confirmation Similar measurements Timeliness BellSouth will not issue disconnect until activate msg. is received from NPAC.	Curc				the number porting process.
Firm Order Confirmation Firm Order Confirmation Similar measurements Timeliness BellSouth will not issue disconnect until activate msg. is received from NPAC.					The key end-user affecting
Firm Order Confirmation Firm Order Confirmation Similar measurements Timeliness BellSouth will not issue disconnect until activate msg. is received from NPAC.					measurement is %
Firm Order Confirmation Similar measurements Timeliness BellSouth will not issue disconnect until activate msg. is received from NPAC.					Installation Appointments
Firm Order Confirmation Similar measurements Timeliness BellSouth will not issue disconnect until activate msg. is received from NPAC.					Met (analogous to %
Firm Order Confirmation Firm Order Confirmation Similar measurements Timeliness BellSouth will not issue disconnect until activate msg. is received from NPAC.		-			Company Caused Missed
Firm Order Confirmation Timeliness BellSouth will not issue disconnect until activate msg. is received from NPAC.	04 0/ 500				Due Dates.)
BellSouth will not issue disconnect until activate msg. is received from NPAC.	"X" hours		Firm Order Confirmation Timeliness	Similar measurements	
BellSouth will not issue disconnect until activate msg. is received from NPAC.	95. Average Response Time				
BellSouth will not issue disconnect until activate msg. is received from NPAC.	for Non-mechanized Rejects				
BellSouth will not issue disconnect until activate msg. is received from NPAC.	Returned with complete and				
BellSouth will not issue disconnect until activate msg. is received from NPAC.	accurate codes				
is received from NPAC.		ellSouth will not issue			Not necessary. BellSouth
		received from NPAC			does not issue a disconnect
TEPRIVAT TROTT NUM					until the activate message is

Failures in processing trigger order would result in Provisioning Trouble Reports and Missed Installation Appointments. Similar measurements. Once the number has been ported, the primary responsibility for handling installation troubles would be between the CLEC and NPAC. However BST would be responsible for insuring that the ported number had been treated properly in the 'from' BST central office. Failures would result in Provisioning Trouble Reports where LNP is separately reported category. When taken together, these two BellSouth measurements address the intent of the SWBT measurement.	Percent Missed Installation Appointments; Total Service Order Cycle Time Coordinated Customer S	with the service BellSouth troubles would be addressed in the UNE Loop category above.	99. Average Delay Days for SWBT Missed Due Dates
Failures in processing trigger order would result in Provisioning Trouble Reports and Missed Installation Appointments. Similar measurements. Once the number has been ported, the primary responsibility for handling installation troubles would be between the CLEC and NPAC. However BST would be responsible for insuring that the ported number had been treated properly in the 'from' BST central office. Failures would result in Provisioning Trouble Reports where LNP is separately reported category. When taken together, these two BellSouth measurements address the intent of the SWBT measurement.	nt Missed Installation intments; Service Order Cycle	with the service BellSouth troubles would be addressed in the UNE Loop category above.	99. Average Delay Days for SWBT Missed Due Dates
Failures in processing trigger order would result in Provisioning Trouble Reports and Missed Installation Appointments. Similar measurements. Once the number has been ported, the primary responsibility for handling installation troubles would be between the CLEC and NPAC. However BST would be responsible for insuring that the ported number had been treated properly in the 'from' BST central office. Failures would result in Provisioning Trouble Reports where LNP is separately reported category. When taken together, these two BellSouth measurements address the intent of the	d Installation	with the service BellSouth troubles would be addressed in the UNE Loop category above.	99. Average Delay Days for SWBT Missed Due Dates
Failures in processing trigger order would result in Provisioning Trouble Reports and Missed Installation Appointments. Similar measurements. Once the number has been ported, the primary responsibility for handling installation troubles would be between the CLEC and NPAC. However BST would be responsible for insuring that the ported number had been treated properly in the 'from' BST central office. Failures would result in Provisioning Trouble Reports where LNP is separately reported category. When taken together, these two BellSouth measurements	d Installation	with the service BellSouth troubles would be addressed in the UNE Loop category above.	99. Average Delay Days for SWBT Missed Due Dates
Failures in processing trigger order would result in Provisioning Trouble Reports and Missed Installation Appointments. Similar measurements. Once the number has been ported, the primary responsibility for handling installation troubles would be between the CLEC and NPAC. However BST would be responsible for insuring that the ported number had been treated properly in the 'from' BST central office. Failures would result in Provisioning Trouble Reports where LNP is separately reported category. When taken together, these		with the service BellSouth troubles would be addressed in the UNE Loop category above.	99. Average Delay Days for
Failures in processing trigger order would result in Provisioning Trouble Reports and Missed Installation Appointments. Similar measurements. Once the number has been ported, the primary responsibility for handling installation troubles would be between the CLEC and NPAC. However BST would be responsible for insuring that the ported number had been treated properly in the 'from' BST central office. Failures would result in Provisioning Trouble Reports where LNP is separately reported category.	Z × P T L O E O P O E F	with the service BellSouth troubles would be addressed in the UNE Loop category above.	
Failures in processing trigger order would result in Provisioning Trouble Reports and Missed Installation Appointments. Similar measurements. Once the number has been ported, the primary responsibility for handling installation troubles would be between the CLEC and NPAC. However BST would be responsible for insuring that the ported number had been treated properly in the 'from' BST central office. Failures would result in Provisioning Trouble Reports where LNP is separately	х ¬¬¬¬¬¬¬¬¬¬¬¬¬¬¬¬¬¬¬¬¬¬¬¬¬¬¬¬¬¬¬¬¬¬¬¬	with the service BellSouth troubles would be addressed in the UNE Loop category above.	
Failures in processing trigger order would result in Provisioning Trouble Reports and Missed Installation Appointments. Similar measurements. Once the number has been ported, the primary responsibility for handling installation troubles would be between the CLEC and NPAC. However BST would be responsible for insuring that the ported number had been treated properly in the 'from' BST central office. Failures would result in Provisioning Trouble Reports	т т с с с у с г г	with the service BellSouth troubles would be addressed in the UNE Loop category above.	
Failures in processing trigger order would result in Provisioning Trouble Reports and Missed Installation Appointments. Similar measurements. Once the number has been ported, the primary responsibility for handling installation troubles would be between the CLEC and NPAC. However BST would be responsible for insuring that the ported number had been treated properly in the 'from' BST central office. Failures would result in	T C C C O V O E 7	with the service BellSouth troubles would be addressed in the UNE Loop category above.	
Failures in processing trigger order would result in Provisioning Trouble Reports and Missed Installation Appointments. Similar measurements. Once the number has been ported, the primary responsibility for handling installation troubles would be between the CLEC and NPAC. However BST would be responsible for insuring that the ported number had been treated properly in the 'from' BST central office.	. G E G 7 G E 7	with the service BellSouth troubles would be addressed in the UNE Loop category above.	
Failures in processing trigger order would result in Provisioning Trouble Reports and Missed Installation Appointments. Similar measurements. Once the number has been ported, the primary responsibility for handling installation troubles would be between the CLEC and NPAC. However BST would be responsible for insuring that the ported number had been treated properly in the	ס ב ס ט ס ב י	with the service BellSouth troubles would be addressed in the UNE Loop category above.	
Failures in processing trigger order would result in Provisioning Trouble Reports and Missed Installation Appointments. Similar measurements. Once the number has been ported, the primary responsibility for handling installation troubles would be between the CLEC and NPAC. However BST would be responsible for insuring that the ported number had	ב סיי סיי יי	with the service BellSouth troubles would be addressed in the UNE Loop category above.	
Failures in processing trigger order would result in Provisioning Trouble Reports and Missed Installation Appointments. Similar measurements. Once the number has been ported, the primary responsibility for handling installation troubles would be between the CLEC and NPAC. However BST would be responsible for insuring	σνσε: π	with the service BellSouth troubles would be addressed in the UNE Loop category	
Failures in processing trigger order would result in Provisioning Trouble Reports and Missed Installation Appointments. Similar measurements. Once the number has been ported, the primary responsibility for handling installation troubles would be between the CLEC and NPAC. However BST would	יא סי בי יצ	with the service BellSouth troubles would be addressed	
Failures in processing trigger order would result in Provisioning Trouble Reports and Missed Installation Appointments. Similar measurements. Once the number has been ported, the primary responsibility for handling installation troubles would be between the CLEC and	סי צו: יד	with the service BellSouth	
Failures in processing trigger order would result in Provisioning Trouble Reports and Missed Installation Appointments. Similar measurements. Once the number has been ported, the primary responsibility for handling installation troubles would be			
Failures in processing trigger order would result in Provisioning Trouble Reports and Missed Installation Appointments. Similar measurements. Once the number has been ported, the primary responsibility for handling	- 13	UNE loop was associated	
Failures in processing trigger order would result in Provisioning Trouble Reports and Missed Installation Appointments. Similar measurements. Once the number has been ported, the primary		handled by BellSouth. If a	
Failures in processing trigger order would result in Provisioning Trouble Reports and Missed Installation Appointments. Similar measurements. Once the number has been	ra	for the number would not be	
Failures in processing trigger order would result in Provisioning Trouble Reports and Missed Installation Appointments. Similar measurements.	within 30 days.	ported, installation troubles	days
Failures in processing trigger order would result in Provisioning Trouble Reports and Missed Installation Appointments.	Troubles	Once number has been	98. % LNP I-Reports in 10
Failures in processing trigger order would result in Provisioning Trouble Reports and Missed Installation			
Failures in processing trigger order would result in Provisioning Trouble Reports	20		
Failures in processing trigger order would result in	within 30 days.		
Failures in processing trigger	Troubles		the LNP Order Due Date
			the 10-digit trigger prior to
Similar measurements.	Percent Missed Installation S		97. % of Time SWBT applies
	proposal.		
	measurement to ICG		
e measurements	cell indicates no comparable	Proposal	N.Q.C
	Measurements. A blank	Comments on ICG	measurement to but existing
comparison of ICG	Quality	Commonts on ICC	cell indicates no comparable
-	BS1 Existing Service		ICG rioposai A biank

ICG Proposal a blank		DOT Frieding Commiss		
cell indicates no comparable		Ouality	comparison of ICC	bensouth Comments
measurement to BST existing	Comments on ICG	Measurements. A blank	and BST	*
n.Ac	Proposal	cell indicates no comparable	measurements	
		measurement to ICG		
		proposal.		
101. % Out of Service < 60		Coordinated Customer	Similar measurements.	
Minutes		Conversions.		
		% Rejected Service Requests		
_		Reject Distribution Interval-		
		non-mechanized		
		% Flow Through Service		
		Requests (Summary)		
		% Flow Through Service		
		Requests (Detail)		
		Average Disconnect		
		Timeliness Interval.		
		Disconnect Timeliness		
		Interval Distribution.		
VIII. 911				
102. Average Time to Clear			Parity by design. Both BST	Not necessary. Parity by
Errors			retail and CLEC resale	design. Both BST retail and
			updates are processed by	CLEC resale updates are
			third party. CLECs who	processed by third party.
			serve end-users from a CLEC	CLECs who serve end-users
			E911 updates.	their end-users' E911
				updates.

cell indicates no comparable)	BST Existing Service Ouality	Comments on comparison of ICC	BellSouth Comments
MÕS WORS TOT OF HISH WESTERN	Proposal	Measurements. A blank cell indicates no comparable measurement to ICG	and BST measurements	
103. % Accuracy for 911		<i>proposal.</i> % E911 Accuracy	Similar Measurements	Not people.
database updates		is all a secondary	Parity by design. Both BST	design. Both BST retail and
			retail and CLEC resale	CLEC resale updates are
			updates are processed by	processed by third party.
			third party. CLECs who	CLECs who serve end-users
			serve end-users from a CLEC	from a CLEC switch handle
			switch handle their end-users	their end-users' E911
104. Average Time Required		E911 Timeliness (% within	Similar Measurements	Not pagagant. Don't L
to Update 911 Database		24 hours)	Parity by design. Both BST	design. Both BST retail and
			retail and CLEC resale	CLEC resale updates are
			updates are processed by	processed by third party.
			mind party. CLECS Who	CLECs who serve end-users
			switch handle their end-users	their end-users' E911
			E911 updates	updates.
		E911 Mean Interval and	Parity by design. Both BST	
		Interval Distribution	retail and CLEC resale	
			updates are processed by	
			third party. CLECs who	
			serve end-users from a CLEC	
			E911 updates.	
AND RIGHTS OF WAY			,	

				XI. DIRECTORY
	Similar measurements.	Average Response Time		within the tariffed timelines
	when viewed together.	Average Arrangement 11me		100 0/ of B
	Similar measurements	A vice of the Dates Missed.		SWRT Missed Dive Dates
	Similar massumements	% of Due Dates Missad		108. Average Delay Days for
				Due Dates
	Similar measurements	% of Due Dates Missed		107. % Missed Collocation
				X. COLLOCATION
174.)				
Escapia CC Docket 98-121,				
in compliance with this check				
determined that BellSouth is				
Louisiana – II, the FCC				
critical measurement. In				to Hocess a Nequest
Not necessary. This is not a				to Process a Perment
174.				
Executive Summary and Par.				
list item. CC Docket 98-121,				
in compliance with this check				
determined that BellSouth is				
Louisiana – II, the FCC				
critical measurement. In				within 55 days
Not necessary. This is not a				105. % of requests processed
		proposal.		
	HICASAI CHICHES	measurement to ICG		
	magairements	cell indicates no comparable	Proposal	אלואי
	and BST	Measurements. A blank	Comments on ICG	meusurement to but existing
	comparison of ICG	Quality		cell indicates no comparable
BellSouth Comments	Comments on	BS1 Existing Service		i oposai a ounk

e atch ty by base ty by base base that the atch t		processes.	
y by base base y by by base ttch ttch ttch		processes.	
y by base base itch itch itch		processes.	
y by base base itch itch itch		processes.	
y by base base itch itch itch		be unique to SWB1	without manual intervention.
y by base base itch itch itch			ulat 110w untough the DSK
y by base base ttch ttch ttch		Measurement unclear. May	that flow the part the DCD
y by base litch y by by oase			113 0/ 6 1
y by base atch atch the passe base base base base base base base			
lesale customers are essed in the same batch ellSouth this is parity by gn – Directory database tes from retail and lesale customers are essed in the same batch ellSouth this is parity by gn – Directory database tes from retail and			
lesale customers are essed in the same batch ellSouth this is parity by gn – Directory database tes from retail and lesale customers are essed in the same batch ellSouth this is parity by gn – Directory database			Opdates
essed in the same batch ellSouth this is parity by gn – Directory database ites from retail and lesale customers are essed in the same batch ellSouth this is parity by			Accuracy for Manual
essed in the same batch ellSouth this is parity by gn – Directory database ttes from retail and lesale customers are essed in the same batch			112. % DA Database
lesale customers are essed in the same batch ellSouth this is parity by gn – Directory database tes from retail and lesale customers are essed in the same batch			1100/71
lesale customers are essed in the same batch ellSouth this is parity by gn – Directory database ares from retail and lesale customers are			
lesale customers are essed in the same batch ellSouth this is parity by ign – Directory database ites from retail and			
lesale customers are essed in the same batch ellSouth this is parity by gn – Directory database			based CLEUS
lesale customers are essed in the same batch ellSouth this is parity by			for DA database for facility
lesale customers are essed in the same batch			III. Average Update Interval
tch			
			CLECS
rom retail and			/2 hours for facility based
			into the DA Database within
In BellSouth this is parity by Not necessary. In BellSouth			110. % of updates completed
	proposal.		
	measurement to ICG		
measurements	cell indicates no comparable	Proposal	28,11
and BST	Measurements. A blank	Comments of ICG	Measurement to but existing
comparison of ICG	Quality	Commonts on ICC	massirament to BST existing
Comments on BellSouth Comments	Do I Existing Service		cell in digrater me country

Comparison of ICG's proposed measurements to Service Quality Measurements currently published by BellSouth

Incorporates BellSouth Comments on Late Filed Exhibit 2 regarding unnecessary measurements

ICG Proposal A blank		RCT Frieting Corrigo	Comment	
cell indicates no comparable measurement to BST existing SQM	Comments on ICG Proposal	Quality Measurements. A blank cell indicates no comparable measurement to ICG proposal.	comparison of ICG and BST measurements	beilsouth Comments
114. % Pre-mature		b. op come.		
disconnects (Coordinated Cutovers)				
115. % SWBT caused				
delayed Coordinated				not a crucal measurement
Cutovers				reflected in Customer
				Coordinated Conversion
116 % Missed mechanized				intervals (SQM Page 28)
INP conversions				Not necessary. Since the
				implementation of LNP,
				there is very little INP
		Average Cutover Interval		work fully.
		%Conversions in 5 Minutes		
		%Conversions between 5 and		
		15 Minutes		
		%Conversions > 15 Minutes		
XIII. NXX				
117. % NXXs loaded and				Not necessary This is not
tested prior to the LERG				an important measurement
effective date.				based on no complaints
				despite a high volume of
118 Average Delay Dave for				activity.
NXX loading and testing				Not necessary. This is not
TAZEZE TOUGHTIE WITH COMINE				an important measurement
				based on no complaints
				despite a high volume of
				acuvity.

		OSS Interface Availability OSS Response Interval & Percentages		
				Maintellance OSS
have been received from all CLECs in all 9 states.				Miss Maintagana OSS
Sept 1999, only 48 BFRs				A(10,30,90) business days
volumes. Between Jan and				Authorized BFRs within
Not necessary due to low	See above.			121. % Quotes Provided for
,	would have to be manually tracked due to lack of activity to justify mechanization.			
CLECs in all 9 states.	Therefore this measurement would have little value and			
have been received from all	CLECs in ALL 9 states.			
volumes. Between Jan and	BellSouth has only received a total of 48 BFRs from ALI			within 50 Busiless Days
Not necessary due to low	YTD September 1999,			120. % of Requests processed
				(BFRs)
				REQUEST PROCESS
activity				XIV RONA RIDE
despite a high volume of				
based on no complaints				
Not necessary. This is not				A 10: 1710ml Allino to Inopan
		proposal.		119 Mean Time to Renair
	шеаѕигешентѕ	measurement to ICG	,	
		cell indicates no comparable	Proposal	NÕS
	and RST	Measurements. A blank	Comments on ICG	measurement to BST existing
	comparison of ICG	Quality		cell indicates no comparable
BellSouth Comments	Comments on	DOI EXISTING SERVICE		" I Toposar A out

CERTIFICATE OF SERVICE

I hereby certify that on December 15, 1999, a copy of the foregoing document was served on the parties of record, via the method indicated:

Mand Hand	Gary Hotvedt, Esquire
[] Mail	Tennessee Regulatory Authority
[] Facsimile	460 James Robertson Parkway
[] Overnight	Nashville, TN 37243-0500
D 1/1	
[V] Hand	Henry Walker, Esquire
[] Mail	Boult, Cummings, et al.
[] Facsimile	414 Union Ave., #1600
[] Overnight	P. O. Box 198062
	Nashville, TN 37219-8062